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DLA PIPER US LLP

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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

SEATON INSURANCE COMPANY and STONEWALL INSURANCE COMPANY.

INDEX NO. 07-CV-07032

Plaintiffs.

Judge Berman EFC Case

-accinst-

CAVELL USA, INC. 51k/a KEN RANDALL AMERICA, INC. 51/k/a BASTGATE, INC., and KENNETH RANDALL (Individually),

NOTICE OF WITHDRAWAL AND SUBSTITUTION OF COUNSEL AND PROPOSED ORDER

Defendants.

X

PLEASE TAKE NOTICE that, with the approval of Plaintiffs Seaton Insurance Company and Stonewall Insurance Company and, subject to the approval of the Court, the law firm of Cadwalader, Wickensham & Taft LLP ("Cadwalader"), One World Financial Center, New York, New York 10281 hereby withdraws as co-counsel for Plaintiffs in the above-captioned matter, and DLA Piper US, LLP, 1251 Avenue of the Americas, New York, New York 10020-1104, is hereby substituted in the place of Cadwalader as counsel of record for Plaintiffs Seaton Insurance Company and Stonewall Insurance Company in this action, effective as of the date indicated below.

Attached is an affidavit of substituted counsel in accordance with Local Civil Rule 1.4 of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York.

Dated: New York, New York May 9, 2008

Respectfully submitted.

CADWALADER, WICKERSHAM & TAFT LLP One World Financial Center New York, NY 10281

(212) 504-6000

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DLA Piper US LLP 1251 Avenue of the Americas New York, NY 10020-1104 (212) 335-4500

By: Margane V. Kignolog

AGREED TO:

Seaton Insurance Company

By

Karl J. Wall/

7901 4th Street North, Suite 203

St. Petersburg, FL 33702

(727) 576-1632

Stonewall Insurance Company

Ву

##1 1 W-11

7901 4th Street North, Suite 203

St. Petersburg, FL 33702

(727) 576-1632

SO ORDERED:

U.S.IJ.

5/27/08

Ecclied M. Berman

X

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SEATON INSURANCE COMPANY and
STONEWALL INSURANCE COMPANY,

Plaintiffs,

-against-

INDEX NO. 07-CV-07032

Judge Berman EFC Case

CAVELL USA, INC. f/k/a KEN RANDALL AMERICA, INC. f//k/a EASTGATE, INC., and KENNETH RANDALL (Individually),

LOCAL RULE 1.4 AFFIDAVIT

Defendants.

X

Lawrence I. Brandes, being duly sworn, hereby deposes and says:

- 1. I am a member in good standing of this Court. I have been co-counsel of record for the Plaintiffs in this case since its inception. On April 10, 2008, I resigned my partnership at Cadwalader, Wickersham & Taft LLP. On April 11, 2008 I officially became a partner at DLA Piper US, LLP.
- 2. The Plaintiffs in this action asked me to continue representing them after my move to my new firm. I agreed to do so. Accordingly, I respectfully submit that this Court enter an order approving the replacement of Cadwalader, Wickersham & Taft LLP as counsel of record in this case by DLA Piper US, LLP. This substitution will not affect any of the scheduling previously ordered in this matter.

hurne V

Lawrence I.Brandes

Sworn to before me this 9th day of May, 2008

ofary Public

Notary Public, State of New York
No. 01WI6115819

Qualified in Queens County Commission Expires 9/13/20/18